

JANE DOE
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LOS ANGELES, CALIFORINA 90211

UNITED STATES DISTRICT COURT

Jane Doe ,

Plaintiff, vs.

The United States Of America, The State Of
California, Attorney General Of California Rob
Bonta, Attorney General of The United States Merrick
Garland, Federal Judges Maame Frimpong, Steve
Kim, Article III Judge Donald Malloy, Laura Taylor
Swain, California State Judges Nico Dourbetas,
Stephanie Bowick, Elizabeth Lee, Danny Chao, John
Gransert, Jonathan Karesh, Susan Greenberg, Read
Ambler, Jonathan Cannon, Stephanie George,
Maurice Sanchez

Defendants.

) **Ex Parte Motion for Preliminary**
) **Injunction and Emergency Temporary**
) **Restraining Order Against Deprivation of**
) **Constitutional and Civil Rights**

)
) Judge Honorable David .O. Carter

) CASE NUMBER 23-cv-01283-DOC-KESx

) Dept 10 A

) **September 27, 2024**

**Ex Parte Motion for Preliminary Injunction and Emergency Temporary Restraining Order
Against Deprivation of Constitutional and Civil Rights**

Plaintiff: JANE DOE Defendants: Attorney General of California, U.S. Attorney General, The State Of California, The United States Of AMERICA , Various Judges Relief Sought: Injunctive relief to stop ongoing deprivations of civil, human, and constitutional rights while the Complaint for Injunctive Relief under 42 U.S.C. § 1983 is pending.

Introduction

I

Plaintiff Jane Doe respectfully moves for emergency relief in the form of a preliminary injunction and/or Temporary Restraining Order (TRO) pursuant of F.R.Civ.P. 65 and L.R. 65-1 against the defendants, including the Attorney General of California, the U.S. Attorney General, and state and federal judges. The Plaintiff seeks to enjoin these parties from continuing to deprive her of her civil rights, human rights, and constitutional rights during the pendency of her 42 U.S.C. § 1983 complaint. These violations have placed Plaintiff's life, liberty, and well-being at immediate risk, and judicial misconduct has facilitated ongoing harm, including deprivation of due process, medical treatment, and essential life necessities. This Preliminary Injunction is necessary to prevent further irreparable harm due to the ongoing violations of her constitutional rights, civil rights, and human rights by Defendant Judges and other state actors, under 42 U.S.C. § 1983. Plaintiff has been subjected to systemic corruption, denial of due process, and life-threatening actions resulting in the deprivation of her rights, necessitating immediate court intervention.

Statement of Facts

II

1. Plaintiff is a victim of human trafficking and child exploitation, having been trafficked by an international organized crime syndicate since the age of 15 Plaintiff has never been able to become emancipated and live without explanation. Plaintiff literally evaded being trafficked to the Pickton pig farmers near Vancouver Canada where Range that trafficked her trafficked at least 60 girls and women to a serial killer knowing that they were selling them to a serial killer that would rape them dismember them put them through a meat grinder and feed their remains to pigs. The same organized crime syndicate seen more value in my person and trafficked me to the worlds top 1 percent of billionaire pedophiles. Plaintiff has lived in fear every day of her life. After paying her debt and negotiating her departure from indentured

servitude in 2007 she had remained silent about the crimes perpetrated against her and had no further interaction with the organized crime syndicate. She kept her promise to them and remained silent for her own safety and the after of her extended family. Plaintiff was trafficked through no fault of her own.

2. In 2014, Plaintiff was forced to enter into a settlement agreement orchestrated by her trafficker, Michael Lewis Goguen, a billionaire pedophile, and his legal teams at high-powered law firms, including Quinn Emanuel. When the terms of the agreement were breached by the defendants, Plaintiff sought legal recourse.
3. Despite the irrelevance of trafficking evidence to the breach of contract case, the defendants and their legal counsel exploited this unlawful order, resulting in further threats to Plaintiff's life, culminating in numerous false and fraudulent legal actions against her.
4. Plaintiff has faced continual judicial bias, including:
 - Denial of her right to trial due to incapacitation after surgery.
 - A fraudulent judgment procured in closed-door proceedings in San Mateo Superior Court, led by Judge Danny Chao.
 - Further fraudulent legal actions in Los Angeles and Canada, including a Mareva injunction unlawfully extending control over Plaintiff's assets without proper service of process.

1. History of Judicial Misconduct:

- The judicial misconduct and deprivation of due process began in 2016 after Plaintiff was coerced into signing a personal injury settlement agreement (The legally binding written contract) by her abuser, a pedophilic serial rapist, with the aid of three powerful law firms Quinn Emanuel LLP, Goodwin Procter LLP and Wilson, Sonsini, Goodrich and Rosati LLP. The judicial misconduct began when Plaintiff filed a breach of contract lawsuit. Judges, particularly from the San Mateo Superior Court, began ruling recklessly and depriving Plaintiff of her right to due process, starting with a dangerous and unlawful order by Judge Johnathan Karesh, compelling Plaintiff to disclose the names of the syndicate members who trafficked her, endangering her life and the lives of others. San Mateo judges, including Judge Jonathan Karesh, ordered Plaintiff to provide names of international traffickers, resulting in threats to Plaintiff's life and the lives of third parties, including children. This violated victim protection laws such as the Victims' Rights Act and Marcy's Law. The judicial misconduct began when Plaintiff filed a breach of contract lawsuit. The judicial misconduct began when Plaintiff filed a breach of contract lawsuit. Judges, particularly from the San Mateo Superior Court, began ruling recklessly and depriving Plaintiff of her right to due process, starting with a dangerous and unlawful order by Judge Johnathan Karesh, compelling Plaintiff to disclose the names of the syndicate members who trafficked her, endangering her life and the lives of others.

1 **2. Endangerment and Unlawful Orders:**

- 2
- 3 ○ Defendant's lawyers provoked gang members involved in Plaintiff's trafficking by
- 4 trespassing on their properties, harassing women under their control and demanding
- 5 depositions of traffickers, further endangering Plaintiff's life.

6 **3. Ongoing Collusion and Judicial Corruption:**

- 7 ○ Multiple law firms, including Quinn Emanuel, Patricia Glaser's Glaser Weil LLP,
- 8 Lenczner Slaughter LLP and Nemecek & Cole LLP, conspired to fraudulently procure
- 9 judgments against Plaintiff in multiple jurisdictions (San Mateo California, Los
- 10 Angeles California, Ontario, Canada) without due process or proper service.
- 11 ○ Federal Judges, including Judge Maame Frimpong and Judge Steve Kim, dismissed
- 12 Plaintiff's federal actions under invalid applications of res judicata, denying Plaintiff's
- 13 right to a jury trial in violation of her constitutional rights under the 7th Amendment.
- 14 Plaintiff's efforts to obtain due process and fair adjudication have been met with
- 15 systematic obstruction by corrupt judges, including tampering with federal judges
- 16 (e.g., Judge Maame Frimpong), abuse of power by state judges, and continued threats
- 17 to her life and livelihood.

18 **4. Incapacitation and Financial Ruin:**

- 19 ○ Plaintiff has been denied access to her own funds, forced into homelessness, and
- 20 deprived of medical care. Federal and state courts have failed to provide basic
- 21 constitutional protections, allowing her abuser to maintain control over her assets and
- 22 continue abuse by proxy through legal manipulation. Plaintiff is currently without
- 23 adequate shelter, food, and medical care due to these ongoing violations, and is at
- 24 immediate risk of further irreparable harm.

25 ○

26 **5. Immediate Harm:**

- 27 ○ Plaintiff has been left without legal representation, deprived of basic life necessities,
- 28 and is facing continued retaliation and harm. Plaintiff's medical needs remain unmet
- 29 due to unlawful deprivation of funds, and interference with her medical team through
- 30 Ex parte telephone threats from her abusers lawyers. Plaintiff now she faces threats of
- 31 imprisonment for attempting to defend her rights in courts of law if Her abuser and his
- 32 lawyers pull off another fraudulent closed door bench Quasi Criminal trial Starting on
- 33 September 31, 2024 in San Mateo Superior Court for "criminal defamation" of a
- 34 pedophilic serial rapist. Defendants lawyers allege plaintiff must be prevented from
- 35 providing evidence in courts of law and in Legal pleadings which are protected by the
- 36 litigation privilege. Defendant and his lawyers seek to prevent payoff from providing
- 37 evidence to law enforcement so the defendant can continue to sexual abuse girls and
- 38 women through his sex trafficking conspiracy. Defendants lawyers have failed to
- 39 participate in discovery on all accounts prior to the upcoming malicious persecution
- 40 trial. Plaintiff has been deprived of all due process and the ability to gather evidence to
- 41 adequately defend her self at trial

42 **6. Corruption and Bribery of Judges:**

- Judges, including but not limited to Judge Nico Dourbetas and Judge Danny Chao, are involved in an ongoing conspiracy to deprive Plaintiff of her civil rights through reckless rulings, fraudulent orders, and fraudulent vexatious litigant designations aimed at denying Plaintiff access to the courts.

7. International Human Rights Violations:

- The U.S. and California judiciary's actions violate numerous international human rights conventions, including:
 - **Article 2(c) of the Convention on the Elimination of All Forms of Discrimination Against Women**
 - **Article 2(1) and 14 of the Convention Against Torture**
 - **The International Human Rights Act**
 - **The Human Trafficking Victims Protection Act**

Legal Standard for TRO and Preliminary Injunction

III

To obtain a preliminary injunction, Plaintiff must establish:

- 1. Likelihood of Success on the Merits:** Plaintiff has a strong likelihood of success in her 42 U.S.C. § 1983 case given the overwhelming evidence of judicial misconduct, violations of constitutional rights, and collusion among judges and defense counsel. Plaintiff's claims, including violations of her First Amendment rights, due process rights under the Fourteenth Amendment, and rights under the Human Trafficking Victims Protection Act, have a strong likelihood of success. The ongoing conspiracy to deprive Plaintiff of due process and facilitate the obstruction of justice through fraudulent proceedings and judicial misconduct is well-documented.
- 2. Irreparable Harm:** Plaintiff faces irreparable harm if the injunction is not granted, including deprivation of due process, further threats to her life and safety, loss of her ability to pursue her claims, and irreversible damage to her health due to denial of medical care. Plaintiff has suffered and continues to suffer immediate and irreparable harm due to the actions of the Defendant judges, including the deprivation of her constitutional rights, human rights, and civil rights. The threat to Plaintiff's life from the defendants' actions is imminent, as she is being deprived of necessary medical treatment, shelter, and basic life necessities.

1
2 **3. Balance of Hardships:** The balance of hardships strongly favors Plaintiff, as denying the
3 injunction would result in continued deprivation of her basic rights, whereas granting it would
4 merely prevent further violations of the law by the defendants. The public has a strong interest
5 in ensuring that victims of human trafficking receive due process and that the judiciary
6 upholds constitutional protections. Granting this injunction would prevent further miscarriage
7 of justice and ensure that Plaintiff's rights are protected.

8 **4. Public Interest:** It is in the public interest to ensure that courts uphold constitutional rights
9 and protect victims of human trafficking, judicial misconduct, and corruption. The public has
10 a strong interest in ensuring that victims of human trafficking receive due process and that the
11 judiciary upholds constitutional protections. Granting this injunction would prevent further
12 miscarriage of justice and ensure that Plaintiff's rights are protected.

13 **Relief Requested**

14 **IV**

15 Plaintiff respectfully requests the following relief:

- 16 1. An immediate TRO and preliminary injunction against the Attorney General of California and
17 the U.S. Attorney General to prevent further deprivations of Plaintiff's civil and constitutional
18 rights by state and federal judges while her Complaint for Injunctive Relief under 42 U.S.C. §
19 1983 is pending.
- 20 2. An order barring all further adverse actions against Plaintiff, including but not limited to:
- 21 ○ Attempts to collect or enforce fraudulent judgments.
 - 22 ○ Further deprivation of medical treatment and basic life necessities.
 - 23 ○ Retaliation by state or federal courts, including vexatious litigant designations and
24 unlawful orders.
- 25 3. An order mandating that Plaintiff's due process rights be fully restored and enforced,
26 including the right to a fair trial by jury, access to her funds, and immediate relief from
27 fraudulent judgments.
- 28 4. A stay of all state and federal proceedings against Plaintiff that have been tainted by fraud,
judicial bias, and deprivation of rights, pending the outcome of her § 1983 case.

Conclusion

V

1 For the foregoing reasons, Plaintiff respectfully requests that this Court grant her Motion for a TRO
2 and Preliminary Injunction to stop the ongoing deprivation of her constitutional and civil rights,
3 restore her access to due process, and protect her from further harm by corrupt judges, lawyers, and
4 law enforcement.

5 **Dated: Friday September 27, 2024**

6 Respectfully submitted,

7 

8 Jane Doe

9 In Propria Persona

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15 **DECLARATION OF JANE DOE**

16 **I, Jane Doe , declare as follows:**

- 17
- 18 1. I am the Plaintiff in this matter and a self-represented litigant.
 - 19 2. On IN THE SAN MATEO MALICIOUS PERSECUTION CASE FOR THE QUASI
20 CRIMINAL TRIAL FOR “CONTEMPT DEFAMATION” on August 12th and August 13th, I
21 served requests for document production and notices of depositions on lawyers and key
22 witnesses in this matter. The crime fraud accretion applies to all of the attorney client
23 privilege as the “lawyers” for the pedophile and serial rapist Michael Lewis Goguen has
24 lawyers from Quinn Emanuel LLP Goodwin Procter LLP and Wilson Sonsini LLP and my
25 former lawyers have for the last 10 years constrained to abstract justice and have perorated a
26 malicious conspiracy to end my life and bar me from ligating my damages in courts of law
27 and have tampered with law enforcement to pervert a criminal investigation.
 - 28 3. Defendant and his counsel have refused to respond to my discovery requests or participate in
depositions. In the last 8 years of litigation in multiple jurisdictions Michael Lewis Goguen
and his lawyers have failed to participate in discovery Goguen perjured his deposition taken
in the instant case. His Quinn Emanuel lawyers marked the transcript as attorneys eyes only.
They have never provided my a copy after tampering with my attorneys so that I would be left
in Pro Per. I have never recanted the deposition videos nor the videos of the fake trail in which
they procured this fraudulent judgement. The only document Michael Lewis Goguen has ever
produced is his drivers license and I have no idea how that is even relevant to the case.

- 1 4. Without access to the requested discovery, I am unable to adequately defend myself in the
2 upcoming trial.
- 3 5. Goguen's Malicious and diabolical Quinn Emanuel lawyers are guilty of a long list of felonies
4 which they seek to conceal from the public. They have a vested interest in having me
5 maliciously prosecuted over and over again while at the same time depriving me of the
6 evidence that I must present to the jury at trial.
- 7 6. Goguen and his criminally depraved white supremacist lawyers seek to have it both ways they
8 want all of these proceedings against me where they control and "rig" the justice system
9 against me yet at the same time block my participation in the legal proceedings. I have the
10 constitutional right to defend myself in this trial where they want my jailed for crimes I never
11 committed to silence me about sex crimes perpetrated against me for which I have never been
12 heard in a court of law, never entered evidence in a court of law and never had a trial on the
13 merits of my case in any jurisdiction globally.
- 14 7. I request that the Court continue the trial and compel Michael Lewis Goguen and his
15 "lawyers" to participate in discovery.
- 16 8. I am not a billionaire I am victim child sex trafficking and a long list of other crimes that have
17 kept me under the control of my abusers and exploiters since I was 15 years of age.
- 18 9. Due to the profound and pervasive failings of the tribunals who have time and time again
19 allowed the Quinn Emanuel lawyers to break the law and pervert the course of justice.
- 20 10. I have no access to medical treatment for injuries caused to me by Michael Lewis Goguen.
- 21 11. I am in a shelter in Los Angeles, I lost my only living relatives, My siblings assets remain
22 illegally frozen by yet another fraudulently procured injunction and judgment in Canada, I
23 have no ability to over come what has taken place without a trial by jury of my fellow tax
24 paying citizens who will render a fair and unprejudiced decision on the merits of my case.
- 25 12. I can not afford a lawyer, My former lawyers embezzled all of the money out of my attorney
26 client trust account and Goguen collected the remainder of my money via the fraudulently
27 procured Mareva injunction in Toronto, Canada . Michael Lewis Goguen and his lawyers
28 removed every lawyer I ever retained.
13. I am currently still being blocked from participating in The Orange County case where I am
the defendant in a 100 million dollar lawsuit where Patrica Glaser, Rivers Morrell And
William Paoli who are my former lawyers are attempting to obtain a judgement which was
supposed to be my settlement and they will divide the money between themselves when all of
them failed to properly represent me and conspired with Michael Lewis Goguen and his
lawyers so I would be deprived of a fair trial. Due to the brazen conspiracy among the lawyers
and Judge Nico Dourbetas who refuses to do his job as a Judge appointed to the bench to
serve the people I yet again stand to be maliciously prosecuted and another fraudulent
judgement obtained against me. His failure to uphold the constitutions of both the United States
and California have caused a whole host of new problems for me.
14. I have no money to even pay for accommodations or transportation while attending court in
San Mateo during the upcoming trial.
15. What all of the judges and lawyers who have participated in this conspiracy to obstruct justice
have done is a disgrace to the legal profession and an abomination of the judicial system that
we the people rely upon.
16. My right to a fair trial by jury is a constitutionally protected right to be tried fairly by a jury so
that a judge can not maliciously prosecute an innocent person at the behest of a group of

- degenerate legal deviants and a club of billionaire pedophiles, the right of due process is afforded equally to all people not just the caucasian, the rich, the male species and the guilty.
17. The reason I was trafficked in the first place was because of egregious misconduct of law enforcement and judges and other government officials accepting bribes to look the other way and not prosecute members of organized crime syndicates. My malicious prosecution that is being perpetuated by lawyers and judges acting under the colour of the law has caused me more harm than the gang members that trafficked means more damages than the billionaire pedophiles who procured my sexually exploitive services from my traffickers.
 18. My exploitation day after day year after year has never ceased since I was 15 years of age I am enduring conspiracy among judges law enforcement and government actors. There is no longer a question in my mind why millions of girls globally are trafficked in plain sight.
 19. I stand in this chaos along flight all of these white supremacist that believe I have no right to freedom liberty or life at all just as I stood alone as minor and was told I owed a debt to the hells angels.
 20. There is not a single lawyer or judge who has participated in this that knows what they are doing is unlawful, unconstitutional and malicious yet still from day to day I am forced to endure this legal abuse because I am dealing with mentally ill deranged people working at the behest of a billionaire psychopathic pedophile. There is no judge in Canada or The United States that can revoke my right of due process and is not guilty of misconduct. That said still day after day I watch my dehumanization take place in plain sight and that seems to be perfectly fine for everyone who has participated in my abuse and exploitation.
 21. The "lawyers" now have the audacity to complain that I am proceeding in Pro Se when time after time the lawyers both Goguen's lawyers and my own former lawyers tampered with and removed my retained counsel. There are no law firms that can repent em at this point because of the conflicts of interest that exist due to who was involved in my trafficking the billionaire pedophiles corporations have every major law firm in the country on retainer. A solo practitioner can not fight all of these white shoe law firms.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Signed at Los Angeles, California September 27, 2024

Jane Doe
Jane Doe